

JAP:UAD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-633

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 31 U.S.C. § 5332)

CLAIRE ABDELDAIM,

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

BRIAN COLICA, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 6, 2010, within the Eastern District of New York, the defendant CLAIRE ABDELDAIM did knowingly and with the intent to evade the currency reporting requirements under Title 31, United States Code, Sections 5316(a)(1)(B) and 5316(b), conceal more than \$10,000 in currency and other monetary instruments, to wit, approximately \$170,206 in United States currency in articles of luggage, and transport and transfer and attempt to transport and transfer such currency and monetary instruments from a place outside of the United States to a place within the United States.

(Title 31, United States Code, Sections 5332; Title 18, United States Code, Sections 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bulk cash smuggling discussed in this affidavit, which includes, but is not limited to, my review of the file and conversations with other law enforcement personnel assisting with the investigation.

2. On or about June 6, 2010, the defendant CLAIRE ABDELDAIM arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard KLM Royal Dutch Airlines flight #641 from Amsterdam, Netherlands which originated in Khartoum, Sudan.

3. ABDELDAIM had declared on her customs declaration card that she was carrying \$17,000 in United States currency. Based on this information, ABDELDAIM was referred for a secondary examination.

4. CBP officers asked ABDELDAIM to present the money that she was carrying. The defendant removed two packages from her purse and presented them to the CBP officers. When she removed the items from her purse, CBP officers saw additional


¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendant, I have not included details of every aspect of this investigation.

items in it that were covered in cloth, whereupon ABDELDAIM was escorted to a private search room for verification of the funds.

5. CBP officers examined the two packages presented by ABDELDAIM as well as ABDELDAIM's purse and found a total of \$170,206 in United States currency in her possession.

6. ICE agents read ABDELDAIM her Miranda rights, and the defendant stated that she understood them and was willing to speak without an attorney present. Upon questioning, ABDELDAIM stated that she obtained the money found in her possession by selling land in Sudan, and that she did not declare the funds because she did not want to pay taxes on them.

WHEREFORE, your deponent respectfully requests that the defendant CLAIRE ABDELDAIM be dealt with according to law.



Brian Colica
Special Agent
Immigration and Customs Enforcement

Sworn to before me this
7th day of June 2010

HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK